

# LeBas

LAW OFFICES, APLC

*Lafayette-New Orleans*

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July 28, 2025

**VIA ELECTRONIC SERVICE**

The Honorable George C. Hanks, Jr.

U.S. District Court

Southern District of Texas

515 Rusk Avenue

Houston, TX 77002

RE: Laci N. Blanchard, Individually, and as next friend of W.B.,  
surviving minor child of Ronnie P. Blanchard, Jr. v. Sanare Energy  
Partners, LLC  
Civil Action No. 4:22-cv-2420

Dear Judge Hanks:

On behalf of SBS Energy Services, LLC, please accept this response to the plaintiffs' July 25, 2025 letter requesting a pre-motion conference. We also reiterate our July 8, 2025 request for a pre-motion conference to discuss further proceedings and a motion to expedite a ruling on the pending motion for summary judgment filed by SBS on March 28, 2025.

Under controlling law, this case may not be remanded to state court. There is no dispute that Ronnie Blanchard met his unfortunate demise when a Sanare fixed platform on the OCSLA (Main Pass 64 #19) collapsed while he was in the process of rigging up a hydraulic workover unit. OCSLA governs the case and supports federal question jurisdiction without regard to the citizenship of the parties. 28 USC 1331, *Barker v. Hercules Offshore, Inc.*, 713 F3d 208, 221 (5th Cir. 2013). Sanare, owner of the platform, previously opposed plaintiff's request for remand on the basis of OCSLA jurisdiction and contended that Mr. Blanchard was not a seaman. Sanare has since settled with the plaintiffs, and subsequent discovery has completely undermined the contention by plaintiffs' counsel that Blanchard was a seaman.

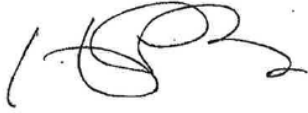
The Court need not address the issue of remand. SBS has already shown, via its motion for summary judgment, that the plaintiffs' attorneys have no evidence - not a single witness - to support the claim of seaman status, and that OCSLA necessarily governs the case.

We'll look forward to discussing these matters at the earliest convenience of the Court. Undersigned counsel is available this week except for Thursday, July 31.

The Honorable George C. Hanks, Jr.  
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Sincerely Yours,

A handwritten signature in black ink, appearing to read 'H. LeBas', with a stylized flourish at the end.

Henry H. LeBas  
[hlebas@lebaslaw.com](mailto:hlebas@lebaslaw.com)  
HHL/aeb

cc: Roland Christensen, *Counsel for Plaintiffs*  
(Via Email)